



# Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency  
Region 10 – Seattle, WA

## *Clean Air Act Full Compliance Evaluation Inspection Report*

**Jade Auto Clinic, Inc.**  
**Pocatello, ID 83201**

**Inspection Date: July 18, 2022**

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Report Author Signature

Date

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U.S. Environmental Protection Agency, Contract Inspector  
Eastern Research Group

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Peer Review Signature

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### Attachments

Attachment 1.....	Idaho Air Quality Compliance Inspection, Preliminary Inspection Findings
Attachment 2.....	Coating Usage Detail

## 1. Basic Facility and Inspection Information

Facility: Jade Auto Clinic, Inc.  
1359 Yellowstone Avenue  
Pocatello, ID 83201

AFS/FRS Number: Not available

State Facility ID: 005-00075

SIC: 7532 Top, Body, and Upholstery Repair Shops and Paint Shops

NAICS: 811121 Automotive Body, Paint, Interior Repair and Maintenance

Permit Number: Idaho Permit to Construct No. P-2011.0035, dated February 10, 2011

Facility Contacts: Ronald Allred  
Owner/Manager  
Jade Auto Clinic, Inc.  
(208) 237-4500  
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Inspectors: Bryan Lange  
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Date of Inspection: July 18, 2022

Inspection Start/End Times: July 18, 2022, 2:40 pm – 3:50 pm MST

Inspection Notice: This was an announced inspection.

Mr. Lange notified Mr. Allred by phone on July 14, 2022.

This was a Clean Air Act (CAA) compliance inspection by an Environmental Protection Agency (EPA) Contractor. Inspector Mr. Lange, with Eastern Research Group, led the inspection. The state air agency was made aware of the inspection beforehand and participated in the inspection. The purpose was to identify potential compliance concerns with CAA regulations, specifically to gather information to determine if the facility is in compliance with the Permit to Construct (PTC) and the National Emission Standards for Hazardous Air Pollutants (NESHAP) subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources).

## **Disclaimer**

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

### **1. Facility/Process Description:**

The following facility description is based on information provided by a facility representative in the opening conference as well as information found on-file regarding permits and prior inspections.

Jade Auto Clinic, Inc. is a refinishing operation that repairs and paints automobiles. It has three paint booths. The emission sources located at the facility included the following:

- Mixing room,
- Spray booths,
- Spray guns,
- Spray gun cleaning equipment,
- Paint storage area, and
- Spray booth heater.

### **2. Compliance History**

On June 11, 2018, Idaho Department of Environmental Quality (DEQ) conducted an on-site inspection and the facility was found in compliance at the time of the inspection.

Jade Auto Clinic, Inc. is not registered in EPA's ECHO as of the date of this report.<sup>1</sup>

### **3. Records Review Prior To The Inspection**

Prior to inspection, Idaho DEQ shared copies of these items and each was reviewed:

- January 31, 2011 - PTC No. P-2011.00030 and statement of basis.
- June 11, 2018 - Idaho inspection report documenting an on-site inspection.

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<sup>1</sup> See <https://echo.epa.gov/>

**a. Entry and Opening Conference**

Mr. Lange and Mr. Aytes (“the inspectors”) arrived at the facility at approximately 2:40 pm MST on July 18, 2022. They entered the customer lobby and met with Mr. Allred. The inspectors presented identification cards and explained that they were at the facility to conduct a CAA inspection. The opening conference included a discussion of operations.

The inspectors explained that the inspection would consist of a review of the PTC conditions followed by a walk-through where records will be reviewed.

The inspectors also explained that following the walk-through, Idaho DEQ would leave the facility with a carbon copy of an Air Quality Compliance Inspection - Preliminary Inspection Findings Form (PIFF) documenting the inspection details and Mr. Aytes would keep the original.

**4. Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (NESHAP Subpart 6H)**

Mr. Allred indicated that the coating materials used on-site do not contain the Subpart HHHHHH target HAP (i.e., compounds of chromium, lead, manganese, nickel, or cadmium) and rule does not apply. Nonetheless, Jade Auto Clinic, Inc. follows the general compliance requirements of the NESHAP.

Specifically, Mr. Allred explained that all painters were trained in the proper application of surface coatings and that high volume-low pressure (HVLP) paint guns are used for all applications of coatings.

**5. Permit to Construct Conditions**

To determine if the facility is in compliance with the VOC and PM<sub>10</sub> emission limits included in the PTC the inspectors reviewed paint consumption records and discussed spray booth filter system maintenance procedures.

Compliance with VOC emission limits are demonstrated with the coating material use limit. Staff indicated that job specific coating use is recorded in the vendor provided software i.e., ColorNet®, but staff had difficulty displaying daily use records.

To learn more about paint usage, the inspector reviewed purchase records, but daily usage figures remained unavailable. Mr. Allred agreed to speak with the Jade Auto Clinic, Inc. paint supplier and collect more detailed usage records.

Mr. Allred explained the paint booth floor exhaust filter replacement procedures. The glass fiber exhaust filters are replaced every 2 or 3 months. The “overspray arrestor” filter media comes in a 30-inch-wide 50-foot-long roll from Paint Pockets® and it is cut to size. Mr. Allred explained that consistent flow is necessary for a quality finish on the automobiles. The inspectors affirmed that 98 percent control efficiency is achievable. These glass fiber filters are identical to the type used at other autobody shops where manufacture guarantees were available.

## 6. Facility Walk-Through and On-Site Records Review

At approximately 3:10 pm MST, the inspectors were escorted to the automobile paint and repair area.

The inspectors observed that each paint gun used for the applications of coatings were HVLP.

Mr. Allred indicated that each paint booth contained a natural gas fired heater and the total heat input capacity all space heaters was less than 10 MMBtu/hr.

The walk-through ended at approximately 3:35 pm MST.

## 7. Closing Conference

At approximately 3:40 pm MST, the inspectors held a closing conference. Mr. Lange led the closing conference and summarized the exemption permit conditions and records observed by the inspectors. Mr. Lange went through his inspection notes and described an area of concern from the inspection.

1. Calculating a daily coating volume was difficult with the available records. It was recommended that changes be made such that compliance with the daily volumes operational requirements can be demonstrated and are actively managed.

Mr. Aytes explained that Jade Auto Clinic Inc. has an option to submit a NESHAP Subpart 6H petition for exemption to EPA. Once this petition has been accepted by EPA then the related compliance activities (e.g., training required under the NEHAP) will no longer be required.

Mr. Aytes presented Mr. Hall with carbon copy of an Idaho DEQ Air Quality Compliance Inspection PIFF documenting inspection details and preliminary status of in-compliance at the time of the inspection.

The inspectors departed the facility at 3:50 pm MST.

Following the inspection activities, Mr. Allred provided some documentation of total usage for January 2021 and July 2021. Specifically, Mr. Powell provided two months of usage records. Monthly totals show that coating use is well below the 4.0 gallons per day operational requirement.

Month	Jan 2020	July 2020
Total Coating Used (Gallons)	0.60	1.37